

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

*In re*

Boy Scouts of America and Delaware BSA, LLC,<sup>1</sup>  
Debtors.

Chapter 11

Bankruptcy Case No. 20-10343 (LSS)

(Jointly Administered)

National Union Fire Insurance Co. of Pittsburgh,  
PA, *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01237-RGA

Travelers Casualty and Surety Company, Inc. *et al.*,  
Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01238-RGA

Old Republic Insurance Company,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01239-RGA

<sup>1</sup> The Debtors in the chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300); and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

General Star Indemnity Company,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01240-RGA

Indian Harbor Insurance Company,

Appellant.

Case No. 22-cv-01241-RGA

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Munich Reinsurance America, Inc.,

Appellant.

v.

Case No. 22-cv-01242-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Arch Insurance Company,

Appellant.

v.

Case No. 22-cv-01243-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Great American Assurance Company *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01244-RGA

The Continental Insurance Co., *et al.*,

Appellees.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01245-RGA

Gemini Insurance Company,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01246-RGA

Traders and Pacific Insurance Company *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01247-RGA

D & V Claimants,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01249-RGA

Argonaut Insurance Company *et al.*,

Appellants.

v.

Case No. 22-cv-01250-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Arrowood Indemnity Company,

Appellant.

v.

Case No. 22-cv-01251-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Liberty Mutual Insurance Company *et al.*,

Appellants.

v.

Case No. 22-cv-01252-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

The Lujan Claimants,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Allianz Global Risks US Insurance Company *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01258-RGA

Case No. 22-cv-01263-RGA

**ORDER GRANTING MOTION ON STIPULATION REGARDING APPEALS  
FROM ORDER CONFIRMING PLAN OF REORGANIZATION OF BOY SCOUTS OF  
AMERICA AND DELAWARE BSA, LLC**

Upon the joint motion (the “Motion”) submitted by Boy Scouts of America and Delaware BSA, LLC (collectively, the “Debtors” or “Appellees”), the Appellants, and the Additional Appellees to the United States District Court for the District of Delaware (the “Court”); and the Court having reviewed the Motion; and the Court having considered the *Stipulation Regarding Appeals from Order Confirming Plan of Reorganization of Boy Scouts of America and Delaware BSA, LLC* (the “Stipulation”),<sup>2</sup> a copy of which is attached hereto Exhibit 1 by and among (i) the Debtors, (ii) the Appellants, and (iii) the Additional Appellees; and the Court having determined that the bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtors and all parties

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Stipulation.

in interest; and upon all the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED that:

1. The Motion is GRANTED.
2. The Stipulation is APPROVED, and the terms and conditions of the Stipulation are incorporated in this Order as if fully set forth herein.
3. The Parties are authorized to take all actions necessary or desirable to effectuate the relief granted pursuant to, and in accordance with, this Order and the Stipulation.
4. These matters are withdrawn from the mandatory referral for mediation and shall immediately proceed through the appellate process of this Court, as set forth in the Stipulation.
5. All of the appeals filed by the Appellants (as that term is defined in the Stipulation) shall be consolidated under case number 22-cv-01237, which shall be the Master Case Number. All further filings with this Court will be docketed under the Master Case Number.
6. For the avoidance of doubt, the appeal styled as *D.W. v. Boy Scouts of America and Delaware BSA, LLC*, Case No. 22-01121, is not consolidated with the other appeals filed by the Appellants and is not subject to the Stipulation.

Dated: 10/17/2022

/s/ Richard G. Andrews

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HONORABLE RICHARD G. ANDREWS  
UNITED STATES DISTRICT JUDGE

**Exhibit 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

*In re*

Boy Scouts of America and Delaware BSA, LLC,<sup>1</sup>  
Debtors.

Chapter 11

Bankruptcy Case No. 20-10343 (L

(Jointly Administered)

National Union Fire Insurance Co. of Pittsburgh,  
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Appellants.

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Boy Scouts of America and Delaware BSA, LLC,  
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Case No. 22-cv-01239-RGA

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Munich Reinsurance America, Inc.,

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Case No. 22-cv-01243-RGA

Great American Assurance Company *et al.*,

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The Continental Insurance Co., *et al.*,

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Case No. 22-cv-01245-RGA

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Gemini Insurance Company,

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Boy Scouts of America and Delaware BSA, LLC,

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Traders and Pacific Insurance Company *et al.*,

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v.

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Boy Scouts of America and Delaware BSA, LLC,

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D & V Claimants,

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Boy Scouts of America and Delaware BSA, LLC,

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Case No. 22-cv-01249-RGA

Argonaut Insurance Company *et al.*,

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v.

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Appellees.

Arrowood Indemnity Company,

Appellant.

v.

Case No. 22-cv-01251-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Liberty Mutual Insurance Company *et al.*,

Appellants.

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Boy Scouts of America and Delaware BSA, LLC,

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The Lujan Claimants,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

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Allianz Global Risks US Insurance Company *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01258-RGA

Case No. 22-cv-01263-RGA

**STIPULATION REGARDING APPEALS FROM ORDER CONFIRMING PLAN OF REORGANIZATION OF BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC**

Boy Scouts of America and Delaware BSA, LLC (collectively, the “Debtors”) and one or more of the Certain Insurers,<sup>2</sup> the claimants represented by Dumas & Vaughn, LLC, the claimants represented by Lujan & Wolff LLP, and other parties in interest that may seek review of the

<sup>2</sup> The Certain Insurers are Allianz Global Risks US Insurance Company, National Surety Corporation, Interstate Fire & Casualty Company, Argonaut Insurance Company, Colony Insurance Company, Liberty Mutual Insurance Company, General Star Indemnity Company, Great American Assurance Company f/k/a Agricultural Insurance Company, Great American E&S Insurance Company f/k/a Agricultural Excess and Surplus Insurance Company, Great American E&S Insurance Company, Arch Insurance Company, Continental Insurance Company, Columbia Casualty Company, Indian Harbor Insurance Company on behalf of itself and as successor in interest to Catlin Specialty Insurance Company, Travelers Casualty and Surety Company, Inc. (f/k/a Aetna Casualty & Surety Company), St. Paul Surplus Lines Insurance Company, Gulf Insurance Company, Arrowood Indemnity Company, Gemini Insurance Company, Munich Reinsurance America, Inc., formerly known as American Re-Insurance Company, Traders and Pacific Insurance Company, Endurance American Specialty Insurance Company, Endurance American Insurance Company, Markel Service, Incorporated, Claim Service Manager for Alterra Excess & Surplus and Evanston Insurance Company, Old Republic Insurance Company, National Union Fire Insurance Company of Pittsburgh, PA., Lexington Insurance Company, Landmark Insurance Company, and The Insurance Company of the State of Pennsylvania.

Confirmation Order by the District Court, (collectively, the “Appellants,”<sup>3</sup> together with the Debtors and the Additional Appellees (as defined below), the “Parties”) hereby stipulate and agrees as follows (the “Stipulation”):

A. WHEREAS, on July 29, 2022, the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) entered and docketed its Opinion [Bankruptcy D.I. 10136] (the “Opinion”);

B. WHEREAS, on September 8, 2022, the Bankruptcy Court docketed and entered its Supplemental Findings of Fact and Conclusions of Law and Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC [Bankruptcy D.I. 10316] (the “Confirmation Order”), confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC [Bankruptcy D.I. 10296] (the “Plan”);<sup>4</sup>

C. WHEREAS, the Appellants intend to seek review by the United States District Court for District of Delaware (the “District Court”) of the Confirmation Order through appeals from the Confirmation Order, the Opinion, and all other subsumed orders pursuant to 28 U.S.C. § 158 and Bankruptcy Rules 8001, *et seq.* (collectively, the “Appeals”); and all appeals from the Confirmation Order, including the Appeals, are expected to be consolidated (the “Consolidated Appeals”);

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<sup>3</sup> The undersigned Appellants have reached agreement with the Debtors and do not purport to speak for or have authority to act on behalf of other potential parties in interest.

<sup>4</sup> Capitalized terms that are used but not otherwise defined herein shall have the meaning ascribed to such terms in the Plan.

D. WHEREAS, an order of the District Court on appeal has been defined to constitute an “Affirmation Order” under the terms set forth in the Confirmation Order and the Plan, and therefore the Parties have agreed to proceed pursuant to the timelines set forth herein;

E. WHEREAS, the Parties seek to avoid the time and expense of motions for stays and contentions of equitable mootness, and therefore the parties have agreed to the provisions in Paragraph 2 below;

F. WHEREAS, the Parties desire to avoid other unnecessary motion practice and to obtain the benefits of an orderly and efficient process for the District Court’s review;

G. WHEREAS, the Tort Claimants’ Committee, the Coalition, the Future Claimants’ Representative, Pfau/Zalkin, Hartford, Century and Chubb Companies, Zurich Insurers and Zurich Affiliated Insurers, Clarendon, the Creditors’ Committee, the Ad Hoc Committee, JPM, and the United Methodist ad hoc committee (collectively, the “Additional Appellees”) have played active roles in the Chapter 11 Cases, including filing pleadings and statements in support of the Plan and Confirmation Order and participating at the Confirmation Hearing and may wish to file briefs in support of the Plan in the Consolidated Appeals;

H. WHEREAS, on June 9, 2020, the Bankruptcy Court appointed mediators in the Debtors’ Chapter 11 Cases for the purpose of mediating various issues, including issues concerning the confirmation of a chapter 11 plan. Since that time, the Appellants participated extensively in the Plan confirmation process and related discovery, and the Debtors engaged in discussions with the Appellants in connection with the confirmation of the Plan, including through formal mediation discussions, but the objections could not be resolved;

I. WHEREAS, the Parties agree that a further formal mediation, as mandated by the District Court's July 23, 2004 Standing Order and September 11, 2012 Standing Order referring appeals from the Bankruptcy Court to mediation (the "Standing Order"), will not succeed; and

J. WHEREAS, the Parties have reached an agreement on the procedure for the District Court's consideration of the Consolidated Appeals that provides for an orderly, efficient, and timely review process as set forth below or to the extent modified by the District Court.

**NOW, THEREFORE**, it is hereby stipulated and agreed to by and between the Parties:

1. The Parties shall seek to have all Consolidated Appeals and any other appeals from the Confirmation Order procedurally consolidated before the District Court pursuant to rule 8003(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") under a single docket number, and all filings shall be made under case number: Case No. 22-cv-01237.

2. The Debtors shall not waive the condition precedent to the Effective Date of the Plan set forth in Article IX.B.1(a) of the Plan prior to entry of the District Court's decision and order on the Consolidated Appeals without providing 28 days' prior notice to the Appellants through email to their undersigned counsel. For the avoidance of doubt, entry of an Affirmation Order satisfies the condition precedent to the Effective Date of the Plan set forth in Article IX.B.1(a) of the Plan such that waiver is no longer required.

3. None of the Parties shall (a) file any of the post-trial motions listed in Bankruptcy Rule 8002(b) that would extend the time to file a notice of appeal, or (b) take any other action to delay the time to file a notice of appeal, and no such motion shall be required.

4. Within fourteen (14) days after entry of the Confirmation Order, the Appellants shall file notices of appeal to the District Court. The Parties shall cooperate to facilitate the

expeditious transmittal by the bankruptcy clerk of the notices of appeal to the District Court, and to facilitate the expeditious opening of a case file for the appeals in the District Court.

5. Each Appellant shall file a Designation of Record (the “Appellants’ Designation of Record”) and a Statement of Issues on the issues to be presented in their appeal, within ten (10) days after the last date on which an Appellant filed its notice of appeal. The Certain Insurers will coordinate to file a consolidated designation of record to the extent feasible. The Debtors and Additional Appellees shall file Counter-Designations of Record (each, a “Counter-Designation of Record”) within three (3) days of the filing of the Appellants’ Designation of Record. The Debtors and Additional Appellees will coordinate to file a consolidated Counter-Designation of Record to the extent feasible. The Parties shall cooperate to facilitate the expeditious transmittal by the bankruptcy clerk to the District Court of the record or notice that the record is available electronically.

6. The court reporters’ final transcripts of the confirmation hearing proceedings beginning on March 14, 2022, and ending on April 14, 2022 (collectively, the “Confirmation Hearing”) shall be designated in their entirety and transmitted to the District Court as the official court reporter’s transcript of the Confirmation Hearing. All documents entered as evidence in the record of the Confirmation Hearing shall also be designated in their entirety and transmitted to the District Court. Each party filing a brief as provided in paragraph 9 below shall, contemporaneously with the filing of such brief, file an appendix containing only the portions of the record on which the Party actually cites in its brief. To the extent that any exhibits or other documents were filed under seal in the Bankruptcy Court, the parties shall file or lodge these exhibits and documents under seal in the District Court pursuant to applicable rules. The Parties shall cooperate in the

submission of a stipulated order in the District Court to permit the filing of such documents under seal without the need for individual sealing motions.

7. The Parties shall file a joint motion in the District Court seeking an order approving this Stipulation (the “Order”) and relief from the Standing Order within five (5) days after the District Court has opened a case number as to any portion of any Appeals filed by Appellants who have signed this Stipulation.

8. The Parties agree that the Additional Appellees are permitted, but are not required, to intervene in the Consolidated Appeals without having to file a motion pursuant to Bankruptcy Rule 8013. To the extent that the applicable rules require intervention by any of the Additional Appellees, they hereby are allowed as intervenors. For the avoidance of doubt, all Parties’ rights to challenge standing are preserved and are not affected by this Stipulation.

9. Briefing, Subject to District Court Approval:

(a) The Parties and Additional Appellees shall endeavor to avoid duplicative briefing on appellate issues and to act in good faith to streamline briefing to the extent feasible.

(b) Each Appellant, other than the Certain Insurers, shall file its principal brief or briefs in respect of its Appeal, each of which, may be up to 19,500 words in length, within thirty (30) days from the filing of the Counter-Designation(s) of Record. The Certain Insurers may file (i) one principal brief of up to 19,500 words; and (ii) supplemental briefs not to exceed 13,000 words in total, each within thirty (30) days from the filing of the Counter-Designation(s) of Record.

(c) The Debtors shall file a single, consolidated brief in response to all of the Appellants’ principal briefs, and the total number of words in such consolidated response may be up to 19,500 words in response to the Certain Insurers’ principal brief and additional words in length equal to the limits for each other principal brief or supplemental brief filed (*e.g.*, to the

extent that there are two other principal briefs filed by Appellants other than the Certain Insurers, the Debtors' consolidated brief in response may be up to 19,500 words plus an additional 39,000 words), within thirty (30) days following the filing of the Appellants' principal briefs.

(d) Any response brief filed by any of the Additional Appellees may be up to 13,000 words in length per brief submitted by such Additional Appellee, and shall be filed within thirty (30) days following the filing of the Appellants' principal briefs.

(e) Each Appellant that has filed a principal or supplemental brief may file a brief in reply to all response briefs within fourteen (14) days following the filing of such response briefs. The Certain Insurers may file (i) one principal reply brief, up to 10,000 words in length, plus an additional 10,000 words for each response brief filed by Additional Appellees; and (ii) supplemental reply briefs, not to exceed 6,500 words in total. Each Appellant, other than the Certain Insurers, may file a reply brief, up to 10,000 words in length, plus an additional 10,000 words for each response brief filed by Additional Appellees.

(f) Except as to length, all briefs filed in the Appeals shall comply with Bankruptcy Rules 8014 and 8015.

10. The Parties agree to file, on or before the conclusion of briefing, statements pursuant to Bankruptcy Rule 8019(a) explaining why oral argument should be permitted and to cooperate to facilitate the scheduling of an expedited date for oral argument.

11. If any due date or deadline contemplated in this Stipulation falls on a weekend or legal holiday, the due date or deadline shall automatically be extended to the next business day, consistent with Bankruptcy Rule 9006(a)(1)(C).

12. Except as modified herein, the procedures applicable to appeals set out in Rules 8001, *et seq.*, of the Bankruptcy Rules, and the local rules of the District Court and Bankruptcy Court, shall apply.

Dated: September 16, 2022

For the Debtors:

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